



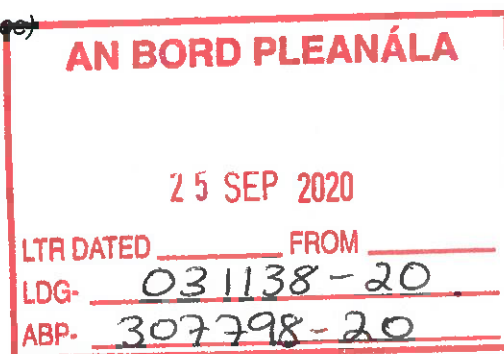
Your Ref: ABP-307798-20

Our Ref: **SID-Shannon**

(Please quote in all related correspondence)

25 September 2020

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902



Via email to [sids@pleanala.ie](mailto:sids@pleanala.ie)

Re: Notification under the Planning and Development Act, 2000, as amended.

**Proposed Strategic Infrastructure Development (SID): SID Foreshore licence application by EirGrid plc, with the consent and approval of the Electricity Supply for permission for the Cross-Shannon Cable Project involves the laying of a new 400 kV cable across the Shannon Estuary between the Moneypoint 400 kV Electricity Substation in the townland of Carrowdotia South County Clare and Kilpaddoge 220/110 kV Electricity Substation in the townland of Kilpaddoge County Kerry.**

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I refer to correspondence to the Department of Culture, Heritage and the Gaeltacht on 30<sup>th</sup> July received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

#### **Underwater Archaeology**

The foreshore licence application by EirGrid Plc. for the cable crossing across the Shannon is noted. A preferred route (Route 2) has been selected and the following observations in relation to underwater archaeology and requirements are based specifically on the assessment of that route. If it is the case that the route selection changes, then the Department should be contacted and a further response will issue accordingly.

The submitted Underwater Archaeological Impact Assessment (UAIA) has been reviewed and it is noted that there has also been archaeological analysis and interpretation of geophysical survey data, with a number of anomalies identified. From the results of the UAIA,

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it is noted that side scan sonar anomaly SS12 is in proximity to the North East extent of the cable on the Moneypoint side towards landing N2. Similarly the localised cluster of magnetometer anomalies M10 in the onshore area of N2 is acknowledged. Both suggest that cultural material may be located on or within the bed of the Shannon in those general locations.

It is acknowledged, in the UAIA report as updated with the application, that the Shannon has the potential to retain underwater cultural heritage in the form of shipwrecks, wreck material or other artefactual material from all eras. A list of 10 recorded wrecks are provided to highlight the potential for the general area, as well as a memorial plaque dedicated to the memory of an additional boat that went down in the specific area in the year 1893. However, previously unrecorded wrecks may have been lost in the area that remain to be discovered, and from all periods of the past. It is also identified from the results of previous archaeological work undertaken in advance of the development of the substation on the Kilpaddoge side that extensive prehistoric archaeology is to be found there, in both the intertidal/foreshore and onshore areas. There is therefore the high potential for further archaeological remains to be encountered in those areas, including wrecks from the prehistoric period associated with any settlement or fishing activity on the coastal or inland plain at the time.

The UAIA puts forward a proposal to undertake archaeological testing in advance of any construction works commencing on the southern landing S1 side. Such testing will, it is acknowledged, be subject to statutory licensing requirements under the National Monuments Acts and a detailed method statement will be required to be submitted to the National Monuments Service as part of that. NMS concurs with the proposal for testing on the S2 landing side, but additional requirements are required by NMS, as detailed below, based on the results and updated review of the UAIA.

Having reviewed the application and associated documentation, the Department has no objections to the foreshore licence being granted once the following is included as conditions of any grant of permission:

#### **Archaeological dive survey & Archaeological Testing**

A licence-eligible, suitably qualified underwater archaeologist shall be engaged to carry out the further archaeological mitigation as detailed below. A detailed method statement is to accompany the licence applications to the National Monuments Service for approval (Dive Survey Licence, Detection Device Consent and Excavation Licence). The archaeologist should be compliant with all licensing requirements, including being up to date with report submissions, etc.

#### **Dive Survey:**

- It is not clear from the UAIA that SS12 can be avoided, as no exclusion zone is indicated. If it can be avoided then an exclusion zone of 100 m should be put in place to ensure that no impact from works can take place to a potential wreck or other feature that may be located there.



- If such an exclusion zone cannot be put in place, then the anomaly shall be the subject of an archaeological dive survey along with the general area to assess the nature and extent of any visible material/features on the channel bed; the dive survey should be accompanied by a hand held metal detection survey.

#### **Archaeological Testing:**

- A detailed plan for the archaeological testing in the area of the south landing S1 shall form part of the licence application and shall follow the route of the cables to the existing substation.
- The area where the localised magnetometer anomalies M10 are located on the nearshore/onshore area at Moneypoint for the northern landing N2 shall also be the subject of archaeological testing.
- The location, nature and extent of all test trenches should be provided and sufficient trenches should be put in place to assess fully the area from the foreshore (at low water) and inshore for N2 to identify what the magnetometer anomalies are and on the foreshore (at low water) to the green field areas and on to the substation for S2 to ensure the line of the cables are fully archaeologically tested.
- The methodology submitted should include a detailed finds retrieval strategy.

#### **Archaeological Dive and Testing Report**

- Once all surveys and testing have been completed, the full information should be compiled into a Report submitted to the Underwater Archaeology Unit, National Monuments Service for review and further comment in advance of any works taking place. The applicant shall be prepared to be advised by the Department in this regard.

It should be borne in mind that should significant archaeological remains be identified, further archaeological mitigation may be required by way of preservation *in situ*/avoidance or full archaeological excavation.

It is strongly advised that the archaeological dive survey and archaeological testing should be carried out in advance of the works contractor being engaged, to ensure that results inform final details for cable placement/completion, particularly if significant archaeological remains are identified, and thus prevent any risk of delays to works when plant and machinery are on site.

The Department reserves making recommendations on the archaeological monitoring requirements for the full works until the Dive Survey and Testing Report has been received, considered and a response issued on same.

#### **Marine Nature Conservation Interests**

The proposed construction of the power cable and associated works at Moneypoint Electricity substation, County Clare to Kilpaddoge, County Kerry, has been evaluated by a Natura Impact Statement.



The conclusion of the Natura Impact Statement document is that the proposed works are unlikely to pose a significant likely risk to marine nature conservation interests in the vicinity with the appropriate application of mitigating measures. The Department concurs with this conclusion provided that all mitigation outlined in Section 3.6 of the NIS is attached as a condition of consent.

### **Other Nature Conservation interests**

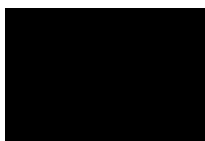
The intertidal shoreline at the proposed cable landfall is within both the Lower River Shannon Special Area of Conservation (SAC) (Site Code 002165) and the River Shannon and River Fergus Estuaries Special Protection Area (SPA) (Site Code 004077). The Natura Impact Statement assesses many of the potential conservation issues associated with this development, but the following are not fully assessed:

- (1) The effects of climate change and associated sea level rise and increased tidal surge heights with regard to the future requirement for greater coastal protection of the cable landfall structure and substation infrastructure. In other words, the question of whether more extensive and higher rock-armouring of the shoreline is likely, within this century, in order to protect the proposed infrastructure from coastal erosion.
- (2) Survey data on bird use of the shore in the vicinity of the proposed landfall does not appear to be included; the reason why these are not collated as part of the assessment of effects (e.g. via disturbance, noise, predator perches on buildings, etc.) is not mentioned.
- (3) With regard to the potential electromagnetic effects on migrating sea lamprey and other fish, on p. 135 of the NIS it is stated that "No negative impacts have been recorded on any of these marine organisms." The scientific sources for this conclusion are not given.

You are requested to send further communications to the Development Applications Unit (DAU) at [manager.dau@chg.gov.ie](mailto:manager.dau@chg.gov.ie), or to the following address:

The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford, Y35 AP90

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Development Applications Unit